

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION  
CIVIL ACTION NO. 3:20-CV-00504-FDW-DSC

CPI SECURITY SYSTEMS, INC.,

Plaintiff,

v.

VIVINT SMART HOME, INC. f/k/a  
Mosaic Acquisition Corp.; and LEGACY  
VIVINT SMART HOME, INC. f/k/a  
Vivint Smart Home, Inc.,

**PLAINTIFF CPI SECURITY  
SYSTEMS, INC.'S  
SUPPLEMENTAL TRIAL  
WITNESS DISCLOSURE**

Defendants.

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Plaintiff CPI Security Systems, Inc. ("CPI") hereby supplements its previously-filed Trial Witness List (Doc 81-7) and Rule 26 disclosures to identify the following individual who is expected to testify on behalf of CPI at trial. All other aspects of CPI's previously-submitted witness list remain unchanged.

**I. CPI EMPLOYEES**

**a. Expected to Testify**

1. **Thomas James (TJ) Groner**, Controller of CPI Security Systems, Inc., c/o Shook, Hardy & Bacon L.L.P., 2555 Grand Boulevard, Kansas City, Missouri 64108. Mr. Groner is disclosed as a substitute witness for previously-disclosed CPI witness and 30(b)(6) corporate representative Eric Schachner in light of Mr. Schachner's recent end of employment with CPI. Mr. Groner will testify regarding the same topics previously described in the disclosure of Mr. Schachner and covered by Mr. Schachner at the 30(b)(6) deposition of CPI, including deceptive sales practices complaints by CPI customers about Vivint and damages and other issues related to those complaints, as well as CPI's trademarks as they relate to the issues in dispute.

Dated: April 7, 2022

Respectfully submitted,

**SHOOK, HARDY & BACON L.L.P.**

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*Counsel for Plaintiff*  
*CPI Security Systems, Inc.*

**CERTIFICATE OF SERVICE**

I certify that on the 7<sup>th</sup> day of April, 2022, I have electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will send notification of filing to all counsel and parties of record.

/s/ Caroline M. Gieser